

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (PITTSBURGH)**

IN RE:)	BANKRUPTCY NO. 15-23207-JAD
)	
WILLIAM J. BORLAK)	Chapter 7
)	
Debtor.)	Document No.
)	
Ocwen Loan Servicing, LLC as servicer)	Hearing: September 13, 2016
For The Bank of New York Mellon)	at 10:00 am
Trust Company, N.A. as successor in)	
Interest to all permitted successors and)	
Assigns of The JPMorgan Chase Bank,)	ANSWER TO MOTION FOR RELIEF
as Trustee for Specialty Underwriting and)	FROM AUTOMATIC STAY
Residential Finance Trust Mortgage Loan)	
Asset-Backed Certificates, Series 2003-)	
BC4)	
Movant)	
)	
vs.)	
)	
WILLIAM J. BORLAK, Debtor and)	
ROSEMARY CRAWFORD, Chapter 7)	
TRUSTEE,)	
)	
Respondents.)	

ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY

AND NOW, comes the debtor, William J. Borlak, by and through his attorney, Max Feldman, Esquire, answer and files the following to movant's motion for Relief from Automatic Stay as follows:

1. Paragraph One of movant's motion is admitted.
2. Paragraph Two of movant's motion is admitted.
3. Paragraph Three of movant's motion is admitted.

4. Paragraph Four of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

5. Paragraph Five of movant's motion is denied. Upon reasonable investigation debtor is without knowledge or information sufficient to form a belief as to the truth of this averment.

6. Paragraph Six of movant's motion is denied and strict proof is demanded at the time of hearing.

WHEREFORE, Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief from Automatic Stay.

Respectfully submitted,

/s/ Max Feldman
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